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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

REGGIE CRANE,

Plaintiff,

vs.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No.: 3:17-cv-01433-WHO

STIPULATION FOR AN EXTENSION OF
TIME OF 45 DAYS FOR DEFENDANT'S
RESPONSE TO PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of an additional 45 days to respond to Plaintiff's motion for summary judgment. This is the first continuance sought by Defendant. The current due date is October 13, 2017. The new due date will be November 27, 2017.

There is good cause for this request. Since the filing of Plaintiff's motion for summary judgment, Defendant's counsel has been diligently addressing her full workload including several district court cases and one Equal Employment Opportunity Commission matter involving discovery, depositions, and travel. In addition, in October, Defendant's counsel was

1 assigned additional unanticipated matters that involved hearing and witness preparation. Despite
2 counsel's diligence in responding to the new matters and her remaining workload, counsel was
3 set back in addressing a number of her cases, including this one and other cases that have been
4 extended. Furthermore, Defendant's counsel will be traveling for work, attending two hearings,
5 and conducting additional depositions in the remainder of October and November.

6 Therefore, Defendant is respectfully requesting additional time up to and including
7 November 27, 2017, to fully review the record and research the issues presented by Plaintiff's
8 motion for summary judgment in this case. This request is made in good faith with no intention
9 to unduly delay the proceedings.

10 The parties further stipulate that the Court's Scheduling Order shall be modified
11 accordingly.

12 Respectfully submitted,

13 Date: October 12, 2017

TONY ARJO, ATTORNEY AT LAW

14 s/ Tony Arjo by C.Chen*

15 (As authorized by phone on 10/12/2017)

16 TONY ARJO

Attorney for Plaintiff

17 Date: October 12, 2017

BRIAN J. STRETCH

18 United States Attorney

19 By s/ Carolyn B. Chen

20 CAROLYN B. CHEN


21 Special Assistant U. S. Attorney

22 Attorneys for Defendant

23 ORDER

24 APPROVED AND SO ORDERED:

25 DATED: October 13, 2017

26 
27 _____
28 HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE